

GIBSON, DUNN & CRUTCHER LLP
SAMUEL G. LIVERSIDGE (*pro hac vice*)
JAY P. SRINIVASAN (*pro hac vice*)
S. CHRISTOPHER WHITTAKER (*pro hac vice*)
333 South Grand Avenue
Los Angeles, CA 90071-3197
Telephone: 213.229.7000
Facsimile: 213.229.7520
sliversidge@gibsondunn.com
jsrinivasan@gibsondunn.com
cwhittaker@gibsondunn.com

HOWARD & HOWARD ATTORNEYS
PLLC
W. WEST ALLEN (NV Bar No. 5566)
3800 Howard Hughes Parkway, Suite 1000
Las Vegas, NV 89169
Telephone: 702.667.4843
Facsimile: 702.567.1568
wwa@h2law.com

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
BORIS BERSHTEYN (*pro hac vice*)
KAREN HOFFMAN LENT (*pro hac vice*
forthcoming)
One Manhattan West
New York, NY 10001-8602
Telephone: 212.735.3000
Facsimile: 917.777.2000

Attorneys for Defendant
PIONEER NATURAL RESOURCES COMPANY

[Additional Attorneys Listed In Signature Block]

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

WESTERN CAB COMPANY, Individually
and on Behalf of All Others Similarly
Situating,

Plaintiff,

v.

PERMIAN RESOURCES CORP. f/k/a
CENTENNIAL RESOURCE
DEVELOPMENT, INC.; CHESAPEAKE
ENERGY CORPORATION;
CONTINENTAL RESOURCES INC.;
DIAMONDBACK ENERGY, INC.; EOG
RESOURCES, INC.; HESS
CORPORATION; OCCIDENTAL
PETROLEUM CORPORATION; and
PIONEER NATURAL RESOURCES
COMPANY,

Defendants.

CASE NO. 2:24-cv-00401-GMN-MDC

**STIPULATION AND ORDER TO
CONSOLIDATE CASE**

Pursuant to Local Rule 7-1, Plaintiff Western Cab Company (“Western Cab”), and all Defendants in this action, Permian Resources Corporation, Chesapeake Energy Corporation, Continental Resources Inc., Diamondback Energy, Inc., EOG Resources, Inc., Hess Corporation, Occidental Petroleum Corporation, and Pioneer Natural Resources Company (together, “Defendants”)¹, by and through their respective counsel and pending the Court’s approval, hereby stipulate as follows:

WHEREAS, Western Cab filed its Complaint against Defendants on February 28, 2024 (ECF No. 1);

WHEREAS, on March 6, 2024, a notice of related cases was filed in this case identifying eight other actions² (the “Related Cases”) filed in this District that “involve the same claims based on the same underlying conduct and were brought against the same defendants on behalf of related putative classes” (ECF No. 8);

WHEREAS, the instant action was reassigned to this Court on March 7, 2024, on the basis that it “asserts substantially overlapping claims, names similar defendants, involves similar questions of fact, and shares a common question of law” as the Related Cases, and accordingly is “related to the others filed in this district within the meaning of Local Rule 42-1” (ECF No. 9 at 1);

WHEREAS, on January 29, 2024, this Court consolidated the following actions because they “involve several shared questions of law and fact” and consolidation “will conserve judicial and litigation resources”: *Rosenbaum et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00103-

¹ By entering into this stipulation, none of the Defendants are waiving any of their potential defenses or arguments to this action, including but not limited to those related to personal jurisdiction and venue.

² The eight other related cases assigned to this Court are: *Rosenbaum et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00103-GMN-MDC; *Andrew Caplen Installations LLC et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00150-GMN-MDC; *These Paws Were Made for Walkin’ LLC v. Permian Resources Corp. et al.*, No. 2:24-cv-00164-GMN-MDC; *Courtmanche et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00198-GMN-MDC; *Mellor et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00253-GMN-MDC; *Santillo et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00279-GMN-MDC; *Beaumont et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00298-GMN-MDC; and *MacDowell et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00325-GMN-MDC.

1 GMN-MDC; *Andrew Caplen Installations LLC et al. v. Permian Resources Corp. et al.*, No. 2:24-
2 cv-00150-GMN-MDC; *These Paws Were Made for Walkin' LLC v. Permian Resources Corp. et*
3 *al.*, No. 2:24-cv-00164-GMN-MDC (No. 2:24-cv-00103, ECF No. 31 at 2);

4 WHEREAS, on March 22, 2024, this Court issued a minute order stating that the Court
5 “finds that this case involves similar questions of law and fact with Case No. 2:24-cv-00103-GMN-
6 MDC *Rosenbaum et. al. v. Permian Resources et. al.* because all Plaintiffs allege harm in the form
7 of increased gasoline and diesel prices due to Defendants’ conduct.” ECF No. 35. The Court
8 ordered the parties “to show cause as to why this case should not be consolidated with 2:24-cv-
9 00103” and to either “file a brief, not to exceed ten pages, if they wish to object to this proposed
10 consolidation” or “file a stipulation to consolidate” by March 29, 2024. *Id.*

11 NOW, THEREFORE, the parties have agreed, and respectfully submit for approval by the
12 Court the following:

- 13 1. This case is consolidated for all purposes under Case No. 2:24-cv-00103-GMN-
14 MDC, before District Judge Gloria Navarro and Magistrate Judge Maximiliano
15 Couvillier.

16 **IT IS SO STIPULATED.**

17
18
19
20
21
22
23
24
25
26
27
28

Dated: March 29, 2024

Dated: March 29, 2024

By: /s/ Samuel G. Liversidge

Samuel G. Liversidge (*pro hac vice*)
 Jay P. Srinivasan (*pro hac vice*)
 S. Christopher Whittaker (*pro hac vice*)
 GIBSON, DUNN & CRUTCHER LLP
 333 South Grand Avenue
 Los Angeles, CA 90071-3197
 Telephone: 213.229.7000
 Facsimile: 213.229.7520
 sliversidge@gibsondunn.com
 jsrinivasan@gibsondunn.com
 cwhittaker@gibsondunn.com

Boris Bershteyn (*pro hac vice*)
 Karen Hoffman Lent (*pro hac vice forthcoming*)
 SKADDEN, ARPS, SLATE, MEAGHER &
 FLOM LLP
 One Manhattan West
 New York, NY 10001-8602
 Telephone: 212.735.3000
 Facsimile: 917.777.2000

W. West Allen (NV Bar No. 5566)
 HOWARD & HOWARD ATTORNEYS PLLC
 3800 Howard Hughes Parkway, Suite 1000
 Las Vegas, NV 89169
 Telephone: 702.667.4843
 Facsimile: 702.567.1568
 wwa@h2law.com

Attorneys for Defendant
 PIONEER NATURAL RESOURCES COMPANY

By: /s/E. Leif Reid

E. Leif Reid (NV Bar No. 5750)
 Kristen L. Martini (NV Bar No. 11272)
 LEWIS ROCA LLP
 3993 Howard Hughes Parkway, Suite 600
 Las Vegas, NV 89169
 Tel: (775) 321-3415
 lreid@lewisroca.com

Jeffrey L. Kessler (*pro hac vice forthcoming*)
 Jeffrey J. Amato (*pro hac vice forthcoming*)
 WINSTON & STRAWN LLP
 200 Park Avenue
 New York, New York 10166

By: /s/ Michael Eisenkraft

Michael Eisenkraft (*pro hac vice*)
 COHEN MILSTEIN SELLERS & TOLL
 PLLC
 88 Pine Street, 14th Floor
 New York, New York 10005
 Telephone: (212) 883-7797
 meisenkraft@cohenmilstein.com

Brent W. Johnson (*pro hac vice pending*)
 Robert W. Cobbs (*pro hac vice*)
 COHEN MILSTEIN SELLERS & TOLL
 PLLC
 1100 New York Avenue NW, 5th Floor
 Washington, DC 20005
 Telephone: (202) 408-4600
 Facsimile: (202) 408-4699
 bjohnson@cohenmilstein.com
 rcobbs@cohenmilstein.com

Robert T. Eglet (NV Bar No. 3402)
 Artemus W. Ham, IV; NV Bar No. 7001
 Erica D. Entsminger; NV Bar No. 7432
 EGLET ADAMS EGLET HAM &
 HENRIOD
 400 South Street, Suite 400
 Las Vegas, Nevada 89101
 Telephone: (702): 450-5400
 Facsimile: (702) 450-5451
 eservice@egletlaw.com

Counsel for Plaintiff

1 Tel: (212) 294-6700
2 jkessler@winston.com
3 jamato@winston.com

4 Thomas M. Melsheimer (*pro hac vice*
5 *forthcoming*)
6 Thomas B. Walsh, IV (*pro hac vice forthcoming*)
7 WINSTON & STRAWN LLP
8 2121 N. Pearl Street, Suite 900
9 Dallas, TX 75201
10 Tel: (212) 294-6700
11 tmelsheimer@winston.com
12 twalsh@winston.com

13 *Attorneys for Defendant*
14 *DIAMONDBACK ENERGY, INC.*

15 By: /s/ J. Colby Williams, Esq.
16 J. Colby Williams, Esq. (5549)
17 Phillip R. Erwin, Esq. (11563)
18 CAMPBELL & WILLIAMS
19 710 South Seventh Street, Suite A
20 Las Vegas, Nevada 89101
21 Telephone: (702) 382-5222
22 jcw@cwlawlv.com
23 pre@cwlawlv.com

24 Marguerite M. Sullivan (*pro hac vice*
25 *forthcoming*)
26 Jason D. Cruise (*pro hac vice forthcoming*)
27 LATHAM & WATKINS LLP
28 555 Eleventh Street, N.W., Suite 1000
Washington, D.C. 20004
Telephone: (202) 637-2200
Marguerite.Sullivan@lw.com
Jason.Cruise@lw.com

Lawrence E. Buterman (*pro hac vice*
forthcoming)
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200
Lawrence.Buterman@lw.com

1 *Attorneys for Defendant*
2 *CHESAPEAKE ENERGY CORPORATION*

3
4 By: /s/ Nicholas J Santoro
5 Nicholas J Santoro (NV Bar No. 532)
6 F. Thomas Edwards (NV Bar No. 9549) HOLLEY
7 DRIGGS LTD
8 300 South 4th Street, Ste 1600
9 Las Vegas, NV 89101
10 Telephone : 702-791-0308
11 Fax: 702-791-1912
12 nsantoro@nevadafirm.com

13 Kevin S. Schwartz (*pro hac vice forthcoming*)
14 David A. Papirnik (*pro hac vice forthcoming*)
15 WACHTELL, LIPTON, ROSEN & KATZ
16 51 West 52nd Street
17 New York, NY 10019
18 Telephone: 212-403-1062
19 kschwartz@wlrk.com

20 *Attorneys for Defendant*
21 *HESS CORPORATION*

22 By: /s/ Patrick G. Byrne
23 Patrick G. Byrne (NV Bar No. 7636)
24 Bradley T. Austin (NV Bar No. 13064)
25 SNELL & WILMER L.L.P.
26 3883 Howard Hughes Parkway, Suite 1100
27 Las Vegas, Nevada 89169
28 Telephone: (702) 784-5200
Facsimile: (702) 784-5252
pbyrne@swlaw.com
baustin@swlaw.com

Devora W. Allon (*pro hac vice forthcoming*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
devora.allon@kirkland.com
Telephone: 212-446-5967
Facsimile: 212-446-4900

Jeffrey J. Zeiger (*pro hac vice forthcoming*)

1 KIRKLAND & ELLIS LLP
2 300 North LaSalle
3 Chicago, IL 60654
4 jzeiger@kirkland.com
Telephone: 312-862-3237
Facsimile: 312-862-2200

5 Akhil K. Gola (*pro hac vice forthcoming*)
6 KIRKLAND & ELLIS LLP
7 1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
8 akhil.gola@kirkland.com
Telephone: 202-389-3256
9 Facsimile: 202-389-5200

10 *Attorneys for Defendant*
11 *OCCIDENTAL PETROLEUM CORPORATION*

12
13 By: /s/ Christopher E. Ondeck
14 Christopher E. Ondeck (*pro hac vice*
forthcoming)
15 Stephen R. Chuk (*pro hac vice forthcoming*)
16 PROSKAUER ROSE LLP
1001 Pennsylvania Avenue NW
17 Washington, DC 20004
Telephone: (202) 416-6800
18 condeck@proskauer.com
schuk@proskauer.com

19 Kyle A. Casazza (*pro hac vice forthcoming*)
20 PROSKAUER ROSE LLP
2029 Century Park East, Suite 2400
21 Los Angeles, CA 90067-3010
Telephone: (310) 284-5677
22 kcasazza@proskauer.com

23 Michael Burrage (*pro hac vice forthcoming*)
24 WHITTEN BURRAGE
512 North Broadway Avenue, Ste 300
25 Oklahoma City, OK 73102
Telephone: (888) 783-0351
26 mburrage@whittenburrage.com

27 *Attorneys for Defendant*
28 *CONTINENTAL RESOURCES, INC.*

1
2 By: /s/ Kristen T. Gallagher
3 Kristen T. Gallagher
4 McDONALD CARANO LLP
5 2300 West Sahara Ave., Suite 1200
Las Vegas, NV 89102
kgallagher@mcdonaldcarano.com

6 Michael W. Scarborough (*pro hac vice*
7 *forthcoming*)
8 Dylan I. Ballard (*pro hac vice forthcoming*)
9 VINSON & ELKINS LLP
10 555 Mission Street, Suite 2000
11 San Francisco, CA 94105
Telephone: (415) 979-6900
Facsimile: (415) 651-8786
mscarborough@velaw.com
dballard@velaw.com

12 Craig P. Seebald (*pro hac vice forthcoming*)
13 Adam L. Hudes (*pro hac vice forthcoming*)
14 Stephen M. Medlock (*pro hac vice forthcoming*)
15 VINSON & ELKINS LLP
16 2200 Pennsylvania Avenue NW
Suite 500 West
Washington, DC 20037
Telephone: (202) 639-6500
Facsimile: (202) 639-6604
cseebald@velaw.com
ahudes@velaw.com
smedlock@velaw.com

19
20 *Attorneys for Defendant*
21 *PERMIAN RESOURCES CORPORATION*

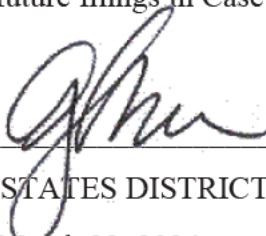
22
23 By: /s/ James J. Pisanelli
24 James J. Pisanelli, Esq., #4027
25 Debra L. Spinelli, Esq., #9695
PISANELLI BICE PLLC
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101

26 John M. Taladay (*pro hac vice forthcoming*)
27 Christopher Wilson (*pro hac vice forthcoming*)
28 Kelsey Paine (*pro hac vice forthcoming*)
Megan Tankel (*pro hac vice forthcoming*)

1 BAKER BOTTS L.L.P.
2 700 K Street N.W.
3 Washington, D.C. 20001-5692
4 Phone (202) 639-7909
5 Fax (202) 639-1165
6 john.taladay@bakerbotts.com
christopher.wilson@bakerbotts.com
kelsey.paine@bakerbotts.com
megan.tankel@bakerbotts.com

7 *Counsel for Defendant*
8 *EOG RESOURCES, INC.*

9
10 **IT IS HEREBY ORDERED** that these actions are consolidated for all purposes under
11 Case No. 2:24-cv-00103-GMN-MDC, before District Judge Gloria Navarro and Magistrate
12 Judge Couvillier. The parties are directed to make all future filings in Case No. 2:24-
13 cv-00103-GMN-MDC.

14 
15 UNITED STATES DISTRICT JUDGE
Dated: March 29, 2024

**CERTIFICATE OF ELECTRONIC FILING
AND CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that on March 29, 2024, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of this Court using the CM/ECF system, which will send a notice of electronic filing to counsel of record receiving electronic notification.

Executed on March 29, 2024

/s/ Samuel G. Liversidge
Samuel G. Liversidge